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Submitted values are:

Your Name: (b) (6)

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As a citizen, taxpayer, parent, and business owner, I value a healthy river and support the concept of cleaning up the Portland Harbor for the benefit of people and environment; however, the costs of the cleanup plan proposed by EPA are wildly disproportionate to the benefits that may be received.

The costs of EPA's cleanup plan will exceed \$1 billion. When EPA's plan is complete, anglers will not be able to eat any more fish than they can eat today because EPA's plan ignores the dangers that mercury poses now and in the future. Furthermore, when the cleanup is complete, it is unclear what benefit, if any, the work will have for ecological receptors. EPA has acknowledged the limitations of the understanding of the risks that hazardous substances in sediment poses to benthic receptors and higher level biota, and EPA has not realistically accounted for ongoing and future migration of hazardous substances to the harbor from upriver and upland sources.

EPA's plan should be modified to target only the most highly contaminated areas of the harbor, allowing ongoing natural recovery to address other areas. Alternative B of the Proposed Plan is an example of a more reasonable cleanup plan. A more targeted cleanup plan would likely result in the same benefits to human health and the environment and would substantially reduce costs, allowing limited resources to be dedicated to addressing more pressing environmental health challenges, such as lead in drinking water and radon in indoor air.

If EPA's goal is maximizing protection of human health and the environment, EPA cannot justify spending more than \$1 billion on a cleanup plan that will, in the short term, increase risks to human and ecological health, and in the long term, resulting in negligible benefits. Instead, EPA should take actions that will result in immediate and measurable benefits to the health of the citizens of Oregon, such as radon mitigation and reducing lead in our school drinking water.